IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs. Respectfully submitted,

/s/Matthew J. Skikos
Matthew J. Skikos
Skikos Crawford Skikos & Joseph
One Sansome Street
Suite 2830
San Francisco, CA 94104
(415) 546-7300
mskikos@skikoscrawford.com
Counsel for Plaintiff

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

2:14-cv-08343	Diana K. Barton	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-08178	Deborah Brown and Donald Hoffman	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-30170	Elizabeth Louise Damato and Michael	vs. Ethicon, Inc.; Johnson & Johnson
	Damato	
2:14-cv-02349	Theresa S. Foster	vs. Ethicon, Inc.; Johnson & Johnson;
		Ethicon, LLC
2:14-cv-17224	Kathy Gaskins and Gary Gaskins	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-22944	Michelle R. Hemming-Ruter and Ted	vs. Ethicon, Inc.; Johnson & Johnson
	Ruter	
2:13-cv-18298	Denise Randall and Guy Randall	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-33061	Betty Louise Tucker	vs. Ethicon, Inc.; Johnson & Johnson;
		Ethicon, LLC
2:13-cv-31957	Veronica Vaessen Theodoor Vaessen	vs. Ethicon, Inc.; Johnson & Johnson;
		Ethicon, LLC
2:14-cv-22278	Barbara Ann Vining and Robert H.	vs. Ethicon, Inc.; Johnson & Johnson
	Vining	
2:18-cv-00938	Wendy Allen	vs. Ethicon, Inc.; Johnson & Johnson